

WESTERN CAROLINA RAILWAY SERVICE

C O R P O R A T I O N

Post Office Box 16614, Greenville, South Carolina 29606 - 7614

E1-1670
Dzw

September 9, 2005

Ms. Diana Wood,
Case Control Unit
Surface Transportation Board
1925 K Street, NW, Suite 512
Washington, DC 20423-0001

Re: STB Docket No. AB-490-1-X
Greenville County Economic Development Corporation
Petition for Exemption for Partial Discontinuance and Partial Abandonment
In Greenville County, SC

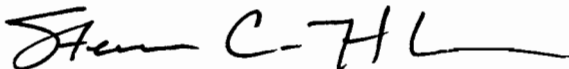
Ms. Wood:

Please find enclosed for filing in STB Docket No. AB-490-1-X, *Greenville County Economic Development Corporation Petition for Exemption for Partial Discontinuance and Partial Abandonment in Greenville County, SC*, one original and two copies of Western Carolina Railway Service Corporation's comments regarding the Environmental Assessment for the above referenced docket

Should you have questions or concerns regarding this letter or the enclosed filing, please do not hesitate to contact me.

Thank you for your time and consideration.

Sincerest regards,



Steven C. Hawkins,
President

Enclosures

WESTERN CAROLINA RAILWAY SERVICE

C O R P O R A T I O N

Post Office Box 16614, Greenville, South Carolina 29606 - 7614

September 9, 2005

ORIGINAL

Ms. Diana Wood,
Case Control Unit
Surface Transportation Board
1925 K Street, NW, Suite 512
Washington, DC 20423-0001

Re: STB Docket No. AB-490-1-X
Greenville County Economic Development Corporation
Petition for Exemption for Partial Discontinuance and Partial Abandonment
In Greenville County, SC

Ms. Wood:

Western Carolina Railway Service Corporation desires to file the following comments and evidentiary materials in response to the Board's August 23 Environmental Assessment for Docket No. AB-490-1-X, *Greenville County Economic Development Corporation Petition for Exemption for Partial Discontinuance and Partial Abandonment in Greenville County, SC*:

1.0 Environmental Assessment, Description of the Line, Page 2, Paragraph 3 –

“There are four railroad trestles on the segments...” and “A steel truss bridge exists in the Southern Segment along Woodruff Road.”

1.0 Comment –

There are 10 bridges and trestles located on both segments, as follows:

Northern Segment:

All Mileposts reference the south end of each structure. * = Approximate

Milepost	Location	Comment	Type
MP 0.20	North of Westfield Street	Reedy River	Trestle - Wood piles, caps, stringers
MP 0.85	North of Willard Street	Relief	Trestle - Wood piles, caps, stringers
MP 1.61	South of West Washington St.	Reedy River	Trestle - Wood piles, caps, stringers
MP 1.71	South of West Washington St.	Relief	Trestle – Wood/steel piles, wood/steel caps, wood stringers
MP 1.74*	North of West Washington (NS, CSXT Connection Track)	Reedy River and Relief	Trestle – Wood/steel piles, wood/concrete caps, wood stringers
MP 2.21	North of Specialty Shearing	Reedy River	Trestle – Wood/steel piles, wood/steel caps, wood stringers

1.0 Comment (cont.) –

Northern Segment: (cont.)

Milepost	Location	Comment	Type
MP 2.69	South of SC Hwy 253	Langston Ck.	Trestle – Wood piles, wood/concrete caps, wood stringers
MP 4.63	West of Vinson Drive	Little Creek	Trestle - Wood piles, caps, stringers

Southern Segment:

All Mileposts reference the south end of each structure.

Milepost	Location	Comment	Type
MP AKJ 585.34	South of I-85	Mid. Laurel Ck.	Trestle - Wood piles, caps, stringers
MP AKJ 587.07	Woodruff Road	Grade Sep.	Steel plate girder with wood ballast deck approach spans

2.0 Environmental Assessment, *Environmental Review*, Page 3, Paragraph 4 –

“...the proposed abandonment... ..will not... ..result in the diversion of rail traffic to truck traffic that could cause significant impacts to air quality.”

2.1 Environmental Assessment, *Environmental Review*, § Traffic, Page 4, Paragraph 4 –

“Traffic has not moved on either segment during GCEDC’s ownership.” and “...this action will not add any truck traffic to area roadways per year.”

2.0, 2.1 Comment –

Statement 2.1 is true in that GCEDC has not honored its common carrier obligation during the entire tenure of its ownership of the subject line; however, as stated in statement 2.0, it is not true that the proposed abandonment will not result in diverted rail to truck traffic.

Fact: Both Paper Cutters, Incorporated and Cross Road Sales currently purchase their products shipped via rail to “alternate” Greenville County rail-served locations (on Norfolk Southern and/or CSX Transportation) and have them trucked from the “alternate” transload location to their manufacturing sites, which are located on the Northern Segment of GCEDC’s rail line, solely due to the current and ongoing unavailability of rail service at their manufacturing site.

Additionally, there are at least two other customers located on the subject line who are forced to 100% truck their products: Carolina Recycling Group could ship scrap from its secondary Greenville site to its primary Lyman site via the subject line; while Bleachery Road Warehouse must purchase its raw materials shipped by truck and outbound its finished goods by truck due to no on-site rail service being made available by GCEDC.

All of this goes without considering the other on-line sites that could potentially generate rail traffic if service was available. Since no service has been provided on the line by GCEDC since its ownership began in 1999, I submit that the last year for which traffic information is available is 1996 and that the count was

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Ms. Diana Wood
Surface Transportation Board
Page 3

2.0, 2.1 Comment (cont.) –

actually 1,089 cars (as cited in GCEDC's June 24 submission). Using the conversion factor of four trucks per rail car (as cited within the subject Environmental Assessment, page 4), this would mean that approximately 4,356 trucks are already being added to local roads and highways.

3.0 Environmental Assessment, Description of the Line, Page 3, Paragraph 5 –

"There are no known hazardous waste sites or known hazardous materials spills on either segment..."

3.0 Comment –

There are at least three hazardous waste sites located adjacent to the Northern Segment of GCEDC's line:

Site 1: Near MP 2.74, Former Union Bleachery site:

- Enclosure 1.0 Greenville County Geographic Information Systems property information
- Enclosure 1.1 South Carolina Department of Health and Environmental Control information
- Enclosure 1.2 U.S. Environmental Protection Agency CERCLIS Database information
- Enclosure 1.3 U.S. Environmental Protection Agency CERCLIS Database information

Site 2: Near MP 11.26, Former Kerr Manufacturing site:

- Enclosure 2.0 Greenville County Geographic Information Systems property information
- Enclosure 2.1 U.S. Environmental Protection Agency CERCLIS Database information

Site 3: Near MP 11.48, Former Quarry site:

- Enclosure 3.0 Greenville County Geographic Information Systems property information
- Enclosure 3.1 U.S. Environmental Protection Agency CERCLIS Database information

4.0 Environmental Assessment, Historic Review, Page 4, Paragraph 5 –

"...two properties listed or eligible for listing in the National Register of Historic Places are adjacent to the Southern Segment, the Monaghan Mill and the Woodside Mill Village." and "...the proposed undertaking will have no adverse effect on the Monaghan Mill and the Woodside Village."

4.0 Comment –

Neither of the subject properties lies on the Southern Segment, as stated.

Both of the subject properties lie on the Northern Segment:

Woodside Mill and its surrounding mill village are located west of the Northern Segment between MP 1.0 and MP 2.0. It is also important to note that this property was not historically served by any of the subject line's predecessors or its current owner. It was historically served by Norfolk Southern predecessor Southern Railway and CSX Transportation predecessor Piedmont and Northern Railway. It is also located approximately 1/2 mile west of the subject line and has never had any physical track connection with it. Woodside Mill and its surrounding village should not be considered in this docket.

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Ms. Diana Wood
Surface Transportation Board
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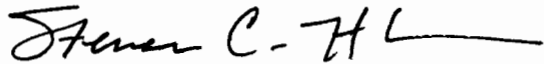
4.0 Comment (cont.) –

Monaghan Mill is located near MP 2.0 and was historically served by the subject line's predecessor, as well as Norfolk Southern predecessor Southern Railway and CSX Transportation predecessors Charleston & Western Carolina Railway and Piedmont and Northern Railway. It did have a physical track connection with the subject line that is proposed for abandonment. Monaghan Mill should be considered in this docket.

See:

Enclosure 4.0 Greenville County Geographic Information Systems property information

Sincerest regards,

A handwritten signature in black ink, appearing to read "Steven C. Hawkins", with a long horizontal line extending to the right.

Steven C. Hawkins,
President

Enclosures

Property Information Viewer - County of Greenville, South Carolina

SEARCH LAYERS LEGEND HELP

Parcel ID: 0160000100201
 Tax Year: 2006
 Jurisdiction: 1
 Owner: AMERICAN FAST PRINT LTD (US)
 Owner 2:
 Mailing Address: PO BOX 5765
 City: SPARTANBURG
 State: SC
 Zipcode: 29304
 Zipcode +4:
 In Care Of:
 Previous Owner: AMERICAN FAST PRINT LTD CORP
 Deed Book: 1267
 Deed Page: 785
 Deed Date: 02/04/1987
 Sales Price: \$0.00
 Plat Book:
 Plat Page: 0
 Subdivision Lot Number:
 Tax District: 235
 Subdivision:
 Landuse: 6800
 Estimated Acres: 39.5
 Site Address Number:
 Site Address Street: BUNCOMBE
 Building Value: \$0.00
 Land Value: \$445,000.00
 Total Value: \$445,000.00
 Square Footage: 0
 Number of Bathrooms: 0
 Number of Bedrooms: 0
 Number of Halfbaths: 0

Zoning Classifications Info Q & A Contact Us Credits Main Page GIS Homepage Greenville County Website

EPA ID: SCD003358744 US FINISHING FIRE
 EPA ID: SCN000407795 US FINISHING FIRE
 SC DHEC: CONE MILLS CORP/UNION BLEACHERY PLANT

Red outline = Subject property

Yellow arrow = GCEDC Northern Segment rail line

This site IS rail served (siding in place)

Environmental Quality Control

D H E C

S.C. Department of Health and Environmental Control

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Public Record

Public Record			
CONE MILLS CORP/UNION BLEACHERY PLANT 3335 OLD BUNCOMBE RD. GREENVILLE SC 29602			
Impacted Media & Nature Of Contamination		Location Information	
Soil Constituents of Concern Found:	Metals, PCBs	County:	GREENVILLE
Ground Water Constituents of Concern Found:	Metals, PCBs	DHEC Region:	2
Surface Water - Sed. Constituents of Concern Found:	Hexavalent Chromium, PCBs	Latitude:	34 53 02.7
Air Constituents of Concern Found:		Longitude:	082 25 31.0
		GPS? Yes	
Land Use Controls		Status Information	
Implemented:		Brownfields Site:	No
Type Used:		Type Brownfields Site:	
What are results of future land use or anticipated results from controls:		128(a) Funds Used for Assessment:	No
Constituents of Concern Addressed:		Response Action Planned for Next FY:	No
Deed Posted for Ground Water:		Project Completed:	--
Surface Water Posted:		Size of the Property:	149 Acreage
Deed Restrictions for Soil:		Was the site cleaned up to unrestricted use?	

SC DHEC



South Carolina Department of Health and Environmental Control

Last update: Dec-NaN-NaN



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CERCLIS Database

US FINISHING FIRE

Site Information

[Site Info](#) | [Aliases](#) | [Operable Units](#) | [Contacts](#)
[Actions](#) | [Contaminants](#) | [Site-Specific Documents](#)

Site Name: US FINISHING FIRE
Street: 3335 OLD BUNCOMBE RD
City / State / ZIP: GREENVILLE, SC 29602

NPL Status: Not on the NPL
Non-NPL Status: NFRAP

EPA ID: SCD003358744
EPA Region: 04
County: GREENVILLE

Federal Facility Flag: Not a Federal Facility

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US FINISHING FIRE

Site Information

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Site Name: US FINISHING FIRE
Street:
City / State / ZIP: GREENVILLE, SC

NPL Status: Not on the NPL
Non-NPL Status: Removal Only Site (No Site
Assessment Work Needed)

EPA ID: SCN000407795
EPA Region: 04
County: GREENVILLE

Federal Facility Flag: Not a Federal Facility

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Chevrolet Volt:

This site IS rail served (siding in place)



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CERCLIS Database

KERR WASTE TREATMENT PLT

Site Information

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Site Name: KERR WASTE TREATMENT PLT
Street: OFF RENFREW AVE
City / State / ZIP: TRAVELERS REST, SC 29690

NPL Status: Not on the NPL
Non-NPL Status: Status Not Specified

ERS Exclusion: An Eligible Response Site (ERS)
Exclusion decision has been made at
this site.

EPA ID: SCD094994423
EPA Region: 04
County: GREENVILLE

Federal Facility Flag: Not a Federal Facility

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Property Information - Greer - County of Greenville South Carolina

SEARCH LAYERS LEGEND HELP

Parcel ID: 0500060100901
 Tax Year: 2005
 Jurisdiction: 1
 Owner: WCA OF SC LLC
 Owner 2:
 Mailing Address: 223 ROCK QUARRY RD
 City: TRAVELERS REST
 State: SC
 Zipcode: 29690
 Zipcode +4:
 In Care Of:
 Previous Owner: EASTMAN BROWN HOLDING CO LLC
 Deed Book: 1668
 Deed Page: 881
 Deed Date: 09/03/1999
 Sales Price: \$4,000,000.00
 Plat Book: 36-8
 Plat Page: 74
 Subdivision Lot Number:
 Tax District: 367
 Subdivision:
 Landuse: 421
 Estimated Acres: 65.1
 Site Address Number:
 Site Address Street: WING QUARRY
 Building Value: \$33,717.00
 Land Value: \$250,200.00
 Total Value: \$283,917.00
 Square Footage: 0
 Number of Bathrooms: 0
 Number of Bedrooms: 0
 Number of Halfbaths: 0

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EPA ID: SC0000363275 TRAVELERS REST GRANITE QUARRY

Red outline = Subject property

Yellow arrow = GCEDC Northern Segment rail line

This site IS NOT rail served (formerly rail served, track removed)



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QUARRY

CERCLIS Database

TRAVELERS REST GRANITE QUARRY

Site Information

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[Actions](#) | [Contaminants](#) | [Site-Specific Documents](#)

Site Name: TRAVELERS REST GRANITE
QUARRY

Street: ROCK QUARRY ROAD

City / State / ZIP: TRAVELERS REST, SC 29690

NPL Status: Not on the NPL

Non-NPL Status: SI Start Needed

EPA ID: SC0000363275

EPA Region: 04

County: GREENVILLE

Federal Facility Flag: Not a Federal Facility

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Property Information Greenville County, South Carolina

SEARCH LAYERS LEGEND HELP

Parcel ID: 01A1000300100
 Tax Year: 2005
 Jurisdiction: 1
 Owner: MONAGHAN MILL LLC
 Owner 2:
 Mailing Address: 17039 SILVER GULL DRIVE
 City: TEGA CAY
 State: SC
 Zipcode: 29706
 Zipcode +4:
 In Care Of:
 Previous Owner: CEDAR LANE LLC
 Deed Book: 2100
 Deed Page: 1842
 Deed Date: 07/26/2004
 Sales Price: \$1,400,000.00
 Plat Book: 15-K
 Plat Page: 87
 Subdivision Lot Number:
 Tax District: 235
 Subdivision:
 Landuse: 940
 Estimated Acres: 17.56
 Site Address Number:
 Site Address Street:
 Building Value: \$184,355.00
 Land Value: \$756,600.00
 Total Value: \$931,155.00
 Square Footage: 0
 Number of Bathrooms: 0
 Number of Bedrooms: 0
 Number of Halfbaths: 0

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Monaghan Mill

Red outline = Subject property

Yellow arrow = GCEDC Northern Segment rail line

This site WAS historically served by GCEDC Northern Segment predecessors